

George M. Duke, K5XU
5127 Parkway Drive
Jackson, Ms 39211
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To: Federal Communications Commission

Re: RM-11306

I wish to be recorded in opposition to the changes in the Amateur Radio Service as proposed in RM-11306. My concerns regarding this proposal include:

1. No mode of operation should receive regulatory precedence over any other mode. RM-11306 clearly favors digital modes over all others. In addition to being potentially highly commercially abused within the Amateur Radio Service, these digital modes are clearly not, and will very likely never be, reasonably accessible to Amateur Radio operators with visual and reading disabilities.
2. No traditional mode of operation should receive regulatory disfavor. RM-11306 stops just short of banning the use of double sideband amplitude modulation (AM) by Amateur Radio operators who enjoy experimenting with, and communicating via this mode. As written, RM-11306 allows the continued use of AM only via a footnote granting an "exception" for this mode. Allowing any mode or technique to exist solely via such a footnote serves only to simplify the future removal of the "exception" with little if any recourse for those operators who would be affected by such a removal. Any restructuring of Amateur Radio Service regulations must, therefore, clearly state the legality of AM and other traditional modes throughout the service.
3. The bandwidth restrictions proposed in RM-11306 raise numerous compliance and enforcement issues. In the current trend of deregulation, coupled with a very limited budget for enforcement, who will become the "official bandwidth police"? The Amateur Radio airwaves are already filled with verbal battles between operators of various modes over bandwidth

issues. As a totally blind Amateur Radio operator, I will not have access to the test equipment necessary to ensure compliance with such specific and limiting bandwidth restrictions. I will be limited to total dependence upon the transmitting equipment in use at my station, and upon the knowledge of other operators about their own receiving equipment in order to determine my compliance. Many Amateur Radio operators who already engage in over-the-air bandwidth battles do so while refusing to understand that bandwidth is as much a function of their receivers as it is of the transmitters of other stations. Thus, RM-11306 only sets the stage for new outbreaks of both "radio rage," and of self-proclaimed "radio cops".

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